

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA,

v.

JOBADIAH SINCLAIR WEEKS.

Hon. Michael A. Hammer, U.S.D.J

Criminal Action No. 19-cr-877 (CCC)

MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant Jobadiah Sinclair Weeks moves to modify his bail conditions. In support of this Motion, Mr. Weeks states:

1. Mr. Weeks has complied with his conditions of release and this Court's Orders after his conditions were last modified without incident.
2. Sentencing has been delayed for several years and the actual sentencing date is still undetermined because co-defendant cases are still not resolved.
3. Pretrial Services has consented to the proposed Order.
4. The Government takes no position on the proposed Order, except to defer to Pretrial Services.
5. Based on appreciation of the assets, after removing the lien on the tract of land in Island County, Washington, pledged by Bradford Weeks and Laura Weeks, the value of the remaining assets will be comparable to the original pledged value.
6. Mr. Weeks' parents are undergoing undue burden and removing third party custodians will not materially change the conditions of release since Mr. Weeks can now travel throughout the United States upon providing Pretrial Services with his itinerary, Mr. Weeks is outfitted with a GPS tracking device, and Mr. Weeks has complied with these conditions without incident.
7. All other conditions of release will remain in effect.

Based on the above, Mr. Weeks respectfully requests that the Court grant this Motion and enter the accompanying Order.

Respectfully submitted,

/s/ David S. Stone

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